

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

2008 Dec 14 PM 08:50

CLERK U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AKRON

In re:) Case No. 08-53983

KIMBERLY VALENTI) Chapter 13

) Judge Marilyn Shea-Stonum

Debtor

Judge Marilyn Shea-Stonum

MOTION

OF EXTENSION OF TIME

FOR FILING DOCUMENTS

Now comes Debtor, by and through counsel and moves the Court for an Order, pursuant to 11 U.S.C. §1107(2)(c) for an additional fifteen (15) day extension of time to file the required schedules and Plan in the above referenced Chapter 13 case.

Debtor's schedules were originally due on November 15, 2008 and the Court has kindly granted two (2) extensions, with the schedules now due on December 14, 2008.

Unfortunately, Debtor Kimberly Valenti is still extremely ill and counsel has still not been able to meet with her to complete the documents necessary.

Wherefore, debtor and counsel pray for a final fifteen (15) day extension of time to file the schedules on or before December 30, 2008.

12/14/2008

Respectfully Submitted,

/s/ Kimberly Valenti
Francis E. Lucas

/s/ Donald P. Mitchell, Jr.
Donald P. Mitchell, Jr. (0016178)
Attorney for Debtor(s)
3766 Fishcreek Rd., Ste. 267
Stow, OH 44224
330-296-7788
bankruptcyfiles@wmconnect.com

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the Motion was duly sent to the below parties via this Court's ECF (and by ordinary U.S. Mail where indicated) this 14th day of December 2008:

U.S. Trustee (via ECF)
Chapter 13, Trustee, (via ECF)

/s/ Donald P. Mitchell, Jr.
Donald P. Mitchell, Jr. (0016178)